



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/SME/LMB/CJN  
F. #2019R01145

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 28, 2020

By FedEx and ECF

Moe Fodeman, Esq.  
Wilson Sonsini Goodrich & Rosati  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019

Re: United States v. Bo Mao  
Criminal Docket No. 19-392 (PKC)

Dear Mr. Fodeman:

Enclosed please find three media containing the government's fourth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions, dated January 22, 2020; February 3, 2020; and February 11, 2020. This discovery is being produced pursuant to the Protective Order entered by the Court on January 10, 2020. See ECF Docket Entry No. 30. Certain identifying terms used herein – specifically, the "Civil Trial," the "Victim Company," "Company 1," and the "Texas University," – are defined in the complaint in this matter. See United States v. Bo Mao, 4:19-MJ-647 (N.D.Tex.). The government also requests reciprocal discovery from the defendant.

	<b>Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
1	USB drive containing transcripts, exhibits, pleadings, and other materials from the Civil Trial	<p>Sensitive Discovery Material (“SDM”)</p> <p>Attorneys’ Eyes Only (“AEO”)</p> <p>Regular Discovery Material (“DM”)</p>	<p>DOJ_MAO_A_0000048238 – 0000048259</p> <p>DOJ_MAO_A_0000048260 – 0000087719; DOJ_MAO_A_0000090056 – 0000090057; DOJ_MAO_A_0000090690; DOJ_MAO_A_0000090888</p> <p>DOJ_MAO_A_0000087720 – 0000090055; DOJ_MAO_A_0000090058 – 0000090689; DOJ_MAO_A_0000090691 – 0000090887; DOJ_MAO_A_0000090889 – 0000123254</p>
2	USB drive containing documents from the Texas University	<p>SDM</p> <p>DM</p>	<p>DOJ_MAO_A_0000123255 – 0000174847</p> <p>DOJ_MAO_A_0000174848 – 0000186086</p>
3	Hard drive containing documents produced to the Victim Company by Company 1 in connection with the Civil Trial	The designated discovery category appears on the face of each document.	DOJ_MAO_A_0000186087 – 0003514439

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

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Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)